

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

Godo Kaisha IP Bridge 1

Plaintiff,

v.

Micron Technology, Inc.;
Micron Semiconductor Products, Inc.; and
Micron Technology Texas, LLC

Defendants.

Civil Action No. 6:20-cv-00178-ADA

JURY TRIAL DEMANDED

ORDER REGARDING JUNE 22, 2021 DISCOVERY HEARING

Pursuant to the Court's June 17, 2021 Standing Order for Discovery Hearings in Patent Cases, the parties respectfully submit this proposed order summarizing the nature of the parties' disputes, discussed during the June 22, 2021 hearing, and the parties' understanding of the Court's ruling on each dispute.

Issue #1 (Micron's mask pattern production):

The parties disputed whether Micron should be compelled to produce information relating to the mask patterns used to pattern and form the capacitors in Micron's accused products, as requested by IP Bridge's Interrogatory No. 14.

The Court ruled that Micron produce the requested information.

Issue #2 (Micron's license production):

The parties disputed whether Micron should produce responsive license agreements in addition to those "that are not cross licenses, do not cover more than 20 patents, do not

relate to joint ventures or product or technology developments, relate to memory circuitry or semiconductor processing, and are within the timeframe of 1995-present.”

The Court ordered that Micron produce any inbound/outbound licenses over the last 20 years that cover the accused features in Micron products.

Issue #3 (IP Bridge’s production of Panasonic documents):

The parties disputed whether IP Bridge should produce documents relating to or stemming from Panasonic Corporation.

The Court ruled that IP Bridge is not required to produce the requested documents.

Issue #4 (IP Bridge’s privilege log):

The parties disputed whether IP Bridge should produce additional responsive documents over whose privilege designations the parties disagree.

The Court ordered that the documents referenced in Micron’s motion be produced to the Court for *in camera* review. The Court will rule on this dispute following the *in camera* review.

Issue #5 (IP Bridge deponents):

The parties disputed whether IP Bridge should provide the depositions of (1) Hiroaki Tanaka, a Board Member of IP Bridge, (2) Kazuya Kikuchi, an employee of IP Bridge, and (3) Ai Takahashi, Hajime Ogawa, and Hideyuki Ogata. Alternatively, Micron requested a continuance until Micron could obtain depositions of these individuals through Japanese discovery channels, or an order for adverse inferences.

The Court ruled that IP Bridge is not required to provide the requested depositions.

Issue #6 (Micron Traveler documents):

The parties disputed whether Micron should be compelled to produce “training travelers” for all accused products with a “Restricted-Attorneys Eyes Only” designation, and remedy IP Bridge for what IP Bridge believed to be misrepresentations regarding the existence of the “training travelers” and obstruction of foundational questioning about the security status of the training travelers during deposition.

The Court ruled that Micron is not required to produce “training travelers,” nor is any remedy necessary.


ALAN D ALBRIGHT
UNITED STATES DISTRICT JUDGE